

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	NO.	
)		
v.)	(JUDGE)
)		
SAMUEL BORGIA and)		
STEVEN BORGIA,)		
)	(ELECTRONICALLY FILED)	
Defendants.)		

INFORMATION

Title 18 U.S.C. § 371
(Conspiracy to Commit Wire Fraud)

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Information:

Defendants SAMUEL BORGIA and STEVEN BORGIA were the owners and operators of Home Resource Center, Inc., hereinafter "HRC," located in Scranton, within the Middle District of Pennsylvania. HRC was a home improvement company formed in 2001 that had approximately 40 employees.

From on or about January 1, 2009, to on or about December 30, 2012, within the Middle District of Pennsylvania, and elsewhere, the defendants,

SAMUEL BORGIA and STEVEN BORGIA,
did knowingly and intentionally combine, conspire, confederate and
agree together, and with other persons both known and unknown to the
United States Attorney, to devise and intend to devise a material
scheme and artifice to defraud the United States and the
Commonwealth of Pennsylvania, and to obtain money and property by
means of materially false and fraudulent pretenses, representations
and promises.

MANNER AND MEANS

The defendants, SAMUEL BORGIA and STEVEN BORGIA
instructed at least ten of their employees to falsely report to the
Pennsylvania Department of Labor that the employees were not
working at HRC and instructed the employees to apply for full
unemployment benefits knowing that the employees were in fact
working at HRC and were not entitled to said benefits. The defendants
SAMUEL BORGIA and STEVEN BORGIA also falsely reported to the
Pennsylvania Department of Labor that they themselves were not
working at HRC and they themselves applied for full unemployment

benefits knowing that they were in fact working at HRC and were not entitled to said benefits.

The defendants SAMUEL BORGIA and STEVEN BORGIA directed employees of HRC to falsely report to the Pennsylvania Department of Labor on a regular basis that work was not available at HRC and that the employees were not working. As a result, the employees were paid maximum allowable unemployment benefits, even though work was available at HRC and even though the employees were working at HRC.

EXECUTION OF THE SCHEME

For the purpose of executing the scheme described above, the defendants and their co-conspirators agreed they would cause to be transmitted by means of wire communication in interstate commerce signals and sounds, including wire transfers totaling more than \$150,0000 in unemployment benefits from the Commonwealth of Pennsylvania and the United States Government to the defendants and their coconspirators, in violation of Title 18, United States Code, Section 1343.

OVERT ACTS


In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of Pennsylvania and elsewhere:

1. On multiple occasions from on or about January 1, 2009 to on or about December 30, 2012, SAMUEL BORGIA, STEVEN BORGIA and their coconspirators caused wire transfers of unemployment benefits to be sent to their personal bank accounts from both the Pennsylvania Department of Labor and the United States Department of Labor.

All in violation of Title 18, United States Code, § 371.

BRUCE D. BRANDLER
United States Attorney

Date:

By: 
EVAN J. GOTLOB
ASSISTANT U.S. ATTORNEY